

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-1789 (CGM)

**SIPA Liquidation
(Substantively Consolidated)**

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

UBS AG, UBS EUROPE SE (f/k/a UBS
(LUXEMBOURG) SA), UBS FUND
SERVICES (LUXEMBOURG) SA, UBS
THIRD PARTY MANAGEMENT
COMPANY SA, ACCESS
INTERNATIONAL ADVISORS LLC,
ACCESS INTERNATIONAL ADVISORS
LTD., ACCESS MANAGEMENT
LUXEMBOURG SA (f/k/a ACCESS
INTERNATIONAL ADVISORS
(LUXEMBOURG) SA) as represented by
its Liquidator MAÎTRE FERNAND
ENTRINGER, ACCESS PARTNERS SA
as represented by its Liquidator MAÎTRE
FERNAND ENTRINGER, PATRICK
LITTAYE, CLAUDINE MAGON DE LA

Adv. Pro. No. 10-04285 (CGM)

VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) in her capacity as Executrix under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), CLAUDINE MAGON DE LA VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) individually as the sole beneficiary under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), PIERRE DELANDMETER, THEODORE DUMBAULD, LUXALPHA SICAV as represented by its Liquidators MAÎTRE ALAIN RUKAVINA and PAUL LAPLUME, MAÎTRE ALAIN RUKAVINA AND PAUL LAPLUME, in their capacities as liquidators and representatives of LUXALPHA, GROUPEMENT FINANCIER LTD.,

Defendants.

STIPULATION AND ORDER EXTENDING TIME TO ANSWER SECOND AMENDED COMPLAINT

WHEREAS, on December 6, 2022, the Court entered an order (ECF No. 340) denying Defendant Theodore Dumbauld's ("Dumbauld") Motion to Dismiss the Second Amended Complaint (the "Order");

WHEREAS, the Order set a deadline of January 31, 2023 by which Dumbauld was to answer the Second Amended Complaint;

WHEREAS, Dumbauld's counsel and the Trustee's counsel previously agreed, at Dumbauld's request, to extend the time to file an Answer to the Second Amended Complaint to February 28, 2023 and a proposed stipulation was submitted to the Court; and

WHEREAS, Dumbauld has requested, and the Trustee's counsel have agreed to, an extension of the deadline to file an answer to the Second Amended Complaint from February 28, 2023 until March 3, 2023;

IT IS HEREBY STIPULATED AND AGREED by and between the parties that:

1. Dumbauld will submit an answer to the Second Amended Complaint on or before March 3, 2023.
2. Nothing in this stipulation shall change any discovery deadlines in this proceeding.

Dated: February 28, 2023
New York, New York

BAKER & HOSTETLER, LLP

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Attorneys for Defendant Theodore Dumbauld

*Attorneys for Irving H. Picard,
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7
Estate of Bernard L. Madoff*

SO ORDERED:

Dated: March 2, 2023
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge